



United States Environmental Protection Agency (EPA)

Region 2

290 Broadway

New York, NY 10007-1866

Underground Storage Tank (UST) Inspection Form

INSPECTOR NAME(S):

Paul Sacker

DATE:

11/13/17

SIC CODE:

ICIS #:

3600003517

I. Location of Tank(s) <input type="checkbox"/> Tribal		II. Ownership of Tank(s) <input type="checkbox"/> same as location (I.)	
Facility Name TCS Gasoline Inc. Karam Mart		Owner Name Karam Mart Inc. Black	
Street Address 653 Hempstead turnpike Inc.		Street Address Oprition Realty Inc.	
City Elmont	State NY	City	State NY
Zip Code 11003		Zip Code	
County Nassau		County Queens	
Phone Number		Phone Number	
Fax Number		Fax Number	
Contact Person(s) Abdul Mannan - clerk		Contact Person(s) Ladpret Singh	
IIA. Ownership of Other Facilities <input type="checkbox"/> Do you own other UST Facilities Yes / No If Yes, How many Facilities <u>only 1 place he operates tanks</u> How many USTs <u>about 100 operating</u>			
III. Notification <input type="checkbox"/> Notification to implementing agency; name <u>NY OFM 2011 TR 00117</u> issued <u>1/31/2011</u> State Facility ID # <u>sent application for registration that not received it</u>			
IV. Financial Responsibility <input type="checkbox"/> State Fund <input type="checkbox"/> Private Insurance: Insurer/Policy # <input type="checkbox"/> Guarantee <input type="checkbox"/> Surety Bond <input type="checkbox"/> Letter of Credit <input type="checkbox"/> Local Government <input type="checkbox"/> Self Insured <input type="checkbox"/> Not Required (Federal & State government, hazardous substance USTs)			
V. Release History N/A <input type="checkbox"/> <input type="checkbox"/> To your knowledge, are there any public or private Drinking Water Wells in the vicinity? Yes / No			
<input type="checkbox"/> Evidence of release or spills at facility <input type="checkbox"/> Greater than 25 gallons (estimate) <input type="checkbox"/> Releases reported to implementing agency; if so, date(s) <u>[280.53]</u> <input type="checkbox"/> Release confirmed; when and how <input type="checkbox"/> Initial abatement measures and site characterization <input type="checkbox"/> Free product removal <input type="checkbox"/> Soil or ground water contamination <input type="checkbox"/> Corrective action plan submitted <input type="checkbox"/> Remediation ongoing <input type="checkbox"/> Remediation completed, no further action; date(s)			
Notes: appears now to be a BP station small BP gasoline			

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VI. Tank Information	Tank No.	10664	10666				
Tank presently in use		Y	Y				
If not, date last used	(see Section XII)						
If empty, verify 1" or less left	(see Section XII)						
Capacity of Tank (gal)		812	6K				
Substance Stored		Reg.	Super				
M/Y Tank installed / Upgraded		11/18/05	12/09/05				
<u>Tank Construction:</u> Bare steel, Sti-P3, Retrofitted sacrificial anode, Impressed Current, Composite, FRP, Interior lining, Vaulted, Double-walled (DW)		SW FRP					
Spill Prevention							
Overfill Prevention (specify type)		Audible Alarm		Not working,			
<u>Special Configuration:</u> Compartmentalized, Manifolded		Has shut off valves.					

VII. Piping Information

Piping Type: Pressure, Suction

Piping Construction:

Bare steel, Sacrificial Anode, Impressed Current, Flex,
FRP, Double-walled (DW)

Tank and Piping Notes:

Audible alarm not working, when tested - but here are
shut-off valves.

Could not observe line in Super sump - too much dirty
water w/ oily sheen. Reg. line was metal - tested and magnetic

VIII. Cathodic Protection

N/A ☐

Integrity Assessment conducted prior to upgrade

Interior Lining: Interior lining inspected

Impressed Current:

CP Test records

Rectifier inspection records

Sacrificial Anode: CP test records

CP Notes:

checked dispenser - lines were metal & bare.

No evidence of corrosion protection on
testing.

Tank No.		10667	10666				
IX. UST system used solely by Emergency Power Generator		N	/				
X. Release Detection							
N/A <input type="checkbox"/>							
Tank RD Methods	ATG	Y	Y				
	Interstitial Monitoring						
	Groundwater Monitoring						
	Vapor Monitoring						
	Inventory Control w/ TIT	Y	Y	* Tanks too old			
	Manual Tank Gauging						
	Manual Tank Gauging w/ TIT						
	SIR						
12 Months <u>Monitoring Records</u> (Must Make Available Last 12 Months For Compliance)							
<p>Tank RD Notes: (State What Months Records Were Available, Describe Any Failures and Describe What Investigation Occurred Due to Failure)</p> <p>Vendor took 350 on site - Low level tank errors showing for both tanks. No historical data from vendor pool on site - Manager not sure who would have.</p>							
Pressurized Piping RD Methods		N/A <input type="checkbox"/>					
12 Months <u>Monitoring Records</u>	Interstitial Monitoring						
	Groundwater Monitoring						
	Vapor Monitoring						
	SIR						
ALLD	Annual Line Tightness Test						
	Present						
	Annual Test						
<p>Piping RD Notes: (State What Months Records Were Available, Describe Any Failures and Describe What Investigation Occurred Due to Failure)</p> <p>No historical line monitoring records or annual LTT or ALLD tests.</p>							

XI. RepairsN/A ☐

Repaired tanks and piping are tightness tested within 30 days of repair completion

Y ☐ N ☐ Unknown ☐

CP systems are tested/inspected within 6 months of repair of any cathodically protected UST system

Y ☐ N ☐ Unknown ☐

Records of repairs are maintained

Y ☐ N ☐ Unknown ☐**XII. Temporary Closure**N/A ☐

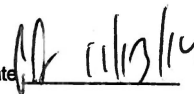
CP continues to be maintained

Y ☐ N ☐ Unknown ☐

UST system contains product and release detection is performed

Y ☐ N ☐ Unknown ☐

Cap and secure all lines, pumps, manways

Y ☐ N ☐ Unknown ☐**Notes:** 11/13/14



THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (EPA) REGION 2 UST
PROGRAM
Underground Storage Tank Team
New York, NY 10007-1866

Facility Name Karam Mort
Address 653 Hempstead rapk
UST Reg # Elmwood, NY

2011 TR00114

Inspector Observation Report
Inspection of Underground Storage Tanks (USTs)

☐ No violations observed at the conclusion of this inspection.

☒ The above named facility was inspected by a duly authorized representative of EPA Region 2, and the following are the inspector's observations and/or recommended corrective action(s):

Potential Violations Observed:

Regulatory Citation	Violation Description
§ 280.45	Failure to maintain records of release detection
§	on tanks
§ 280.41(c)	Failure to provide release detection for lines
§ 280.44(a)	Failure to provide evidence of annual line leak
§ 280.45	Failure to provide detector test
§ 280.20(b)	Failure to provide corrosion protection on lines
§ 280.93(a)	Failure to demonstrate financial responsibility
§	(3rd party liability)

Actions Taken:

☐ Field Citation; # ☐ Additional information required ☐ On-site request/Due date

Comments/Recommendations:

- * Provide Insurance information
- * Need release detection records - last 12 months
- * Need evidence of release detection for lines
- * Need testing of line leak detector.
- * Lines need to be checked for corrosion protection & tested.

Name of Owner/Operator Representative:

Abdul Mamon
(Please print)

[Signature]
(Signature)

Other Participants: _____

Name of EPA Inspector/representative

Paul Sacker
(Please print)

[Signature]
(Signature)

F-16 479

(Credential Number)

Date of Inspection 11/12/14 Time 4:37 AM/PM PM

SITE DRAWING

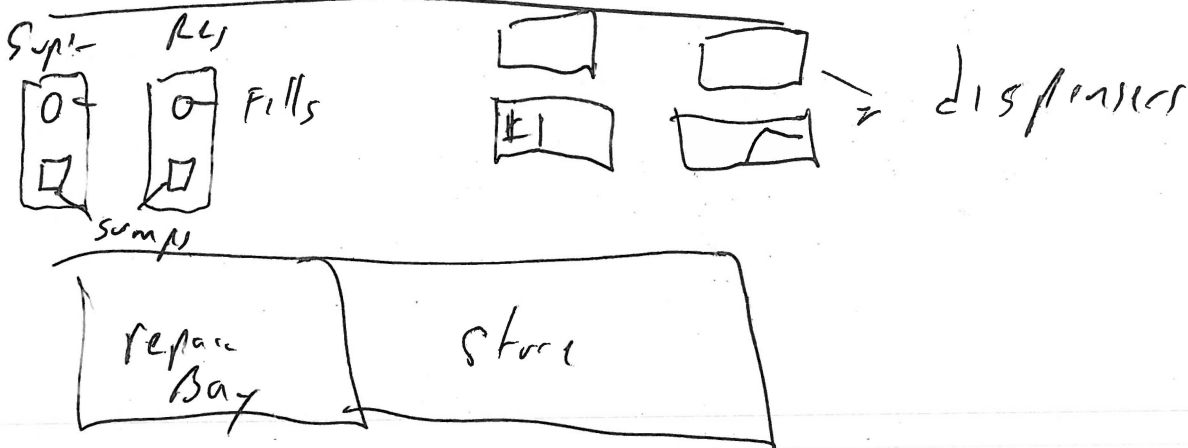
DATE: 11/17/14 TIME ON SITE: 4:00 PM TIME OFF SITE: 4:45 PM

WEATHER: cloudy

ENVIRONMENTALLY SENSITIVE AREA: ☒ Yes ☐ No
If "Yes", please describe:

MM

Hamster to pl



☐ Pictures

Required Fields to be used for ICIS Only

Compliance Monitoring

Activity: UST Inspection

Inspection Conclusion Data Sheet

1) Did you observe deficiencies (preferred violations) during the on-site inspection?

Deficiencies observed: (Put an X for each observed deficiency)

☒ Potential failure to complete or submit a notification, report, certification, or manifest

☒ Potential failure to follow or develop a required management practice or procedure

☒ Potential failure to maintain a record or failure to disclose a document

☐ Potential failure to maintain/inspect/repair meters, sensors, and recording equipment

☐ Potential failure to report regulated events, such as spills, accidents, etc.

2) If you observed deficiencies, did you communicate the deficiencies to the Facility during the inspection? **Yes / No**

3) Did you observe the Facility take any actions during the inspection to address the deficiencies noted? **Yes / No**

If yes, what actions were taken?

4) Did you provide general Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during Inspections? **Yes / No**

5) Did you provide site-specific Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during the inspection? **Yes / No**

pb 11/13/17

Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance?		
			N/A	Y	N
I. Spill Prevention	1	Spill prevention device is present and functional. [280.20(c)(1)(i), 280.21(d)]		<input checked="" type="checkbox"/>	
II. Overfill Prevention	2	Overfill prevention device is present and operational. [280.20(c)(1)(ii), 280.21(d)]		<input checked="" type="checkbox"/>	
		<input checked="" type="checkbox"/> Automatic shutoff is operational (ie., device not tampered with or inoperable) [280.20(c)(1)(ii)(A), 280.21(d)] <input type="checkbox"/> Alarm is operational. [280.20(c)(1) (ii)(B), 280.21(d)] <input type="checkbox"/> Alarm is audible or visible to delivery driver. [280.20(c)(1) (ii)(B), 280.21(d)] <input type="checkbox"/> Ball float is operational. [280.20(c)(1)(ii)(B), 280.21(d)]			
III a. Operation and Maintenance	3	Repaired tanks and piping were tightness tested within 30 days of repair completion (not required w/internal inspections or if monthly monitoring is in use). [280.33(d)]	<input checked="" type="checkbox"/>		
III b. Operation and Maintenance of Corrosion Protection	4	CP systems were tested/inspected within 6 months of repair of any cathodically protected UST system. [280.33(e)]			<input checked="" type="checkbox"/>
	5	Corrosion protection system is properly operated and maintained to provide continuous protection. [280.31(a)(b), 280.70(a)] <input checked="" type="checkbox"/> UST system (Choose one) <input checked="" type="checkbox"/> UST in operation <input type="checkbox"/> UST in temporary closure <input type="checkbox"/> CP System is properly operated and maintained <input type="checkbox"/> CP system is performing adequately based on results of testing. [280.31(b)]; - or - <input type="checkbox"/> CP system tested within required period and operator is conducting or has completed appropriate repair in response to test results reflecting CP system not providing adequate protection.			<input checked="" type="checkbox"/>

Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance?		
			N/A	Y	N
III b. Operation and Maintenance of Corrosion Protection (Continued)	6	UST systems with impressed current cathodic protection are inspected every 60 days. [280.31(c)]	✓		
	7	Lined tanks are inspected periodically and lining is in compliance. [280.21(b)(1)(ii)]	✓		
IV. Tank and Piping Corrosion Protection	8	Buried metal tank and piping (which includes fittings, connections, etc.) is corrosion protected. [280.20(a), 280.20(b), 280.21(b), 280.21(c)]			✓
		<input type="checkbox"/> Buried metal piping components (such as swing joints, flex-connector, etc.) are isolated from the soil or cathodically protected. For new USTs - tanks and piping installed after 12/22/88 [280.20(a), 280.20(b)]: <input type="checkbox"/> Steel tank or piping is coated with suitable dielectric material and cathodically protected. [280.20(a)(2), 280.20(b)(2)] <input type="checkbox"/> Tank is fiberglass, clad, or jacketed and piping is fiberglass or flexible plastic. [280.20(a)(1), 280.20(a)(3), 280.20(a)(5), 280.20(b)(1), 280.20(b)(4)] <input type="checkbox"/> Records are available to document that CP is not necessary. [280.20(a)(4)(ii), 280.20(b)(3)(ii)] For existing USTs - tanks and piping installed on or before 12/22/88 [280.21(b), 280.21(c)]: <input type="checkbox"/> Tank and piping meet new UST requirements [280.21(a)(1)] <input type="checkbox"/> Steel tank is internally lined. [280.21 (b)] <input type="checkbox"/> Metal tank and piping are cathodically protected. [280.21(b)(2), 280.21(c)]			

Notes: N/A - Indicates that the measure is not applicable.

Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Prevention Compliance Measures. In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

Release Detection Compliance Measures Matrix

**Instructions - To Determine Compliance Status of Measures #1-7,
Work Through the Worksheet "Commonly Used Release Detection Methods" Below.**

Regulatory Subject Area	Measure #	SOC Measure/ Federal Citation	In Compliance?		
			N/A	Y	N
I. Release Detection Method Presence and Performance Requirements	1	Release detection method is present. [280.40(a)]		✓	
	2	Release detection system is operating properly (i.e., able to detect a release from any portion of the system that routinely contains product). [(280.40(a)(1))]			✓
	3	Release detection system meets the performance standards at 280.43 or 280.44. [(280.40(a)(3))]		✓	
	4	Implementing agency has been notified of suspected release as required. [(280.40(b))] <input type="checkbox"/> Non-passing results reported and resolved in accordance with implementing agency's directions. [280.40(b)]			
II. Release Detection Testing	5	Tanks and piping are monitored monthly for releases and records are available (must have records for the two most recent consecutive months and for 8 months of the last 12 months). [280.41(a), and 280.45(b)]			✓
III. Hazardous Substance UST Systems	6	Hazardous substance UST system leak detection meets the requirements (i.e., either secondarily contained or otherwise approved by the implementing agency). [280.42(b)]	✓		
IV. Temporary Closure	7	Release detection requirements are complied with (i.e., method present, operational, releases investigated and reported as required) for UST systems containing product. [280.70(a)]	✓		

Worksheet - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurize d Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
<input checked="" type="checkbox"/>	Yes - but not applicable	Tanks too old.	A. Inventory Control with Tank Tightness Testing (T.T.T) <input type="checkbox"/> Inventory control is conducted properly. <input type="checkbox"/> T.T.T. performed as required (See "D" below). <input type="checkbox"/> Inventory volume measurements for inputs, withdrawals, and remaining amounts are recorded each operating day and reconciled as required. [280.43(a)(1), 280.43(a)(3)] <input type="checkbox"/> Equipment is capable of 1/8-inch measurement. [280.43(a)(2)] <input type="checkbox"/> Product dispensing is metered and recorded within local standards for meter calibration to required accuracy. [280.43(a)(5)] <input type="checkbox"/> Water is monitored at least monthly. [280.43(a)(6)]

Release Detection Compliance Measures Matrix

Worksheet (Continued) - Commonly Used Release Detection Methods			
Tank <small>(Choose one)</small>	Pressurized Pipe <small>(Choose Two)</small>	Non-exempt Suction Pipe <small>(Choose one)</small>	Release Detection Method
<input checked="" type="checkbox"/>			B. Automatic Tank Gauge (ATG) <input checked="" type="checkbox"/> ATG is set up properly. [280.40(a)(2)] <input checked="" type="checkbox"/> ATG can detect a 0.2 gal/hr leak rate from any portion of the tank routinely containing product. [280.43(d)(1)] <input type="checkbox"/> ATG is checking portion of tank that routinely contains product. [280.40(a)(1)]
<input type="checkbox"/>			C. Manual Tank Gauging (MTG) <input type="checkbox"/> Tank size is appropriate for using MTG. [280.43(b)(5)] <div style="margin-left: 20px;"><input type="checkbox"/> Tanks 1001 gals (as per EPA memo) and greater restricted to use with T.T.T. (See "D" below) <input type="checkbox"/></div> Method is being conducted correctly. [280.43(b)(4)] <input type="checkbox"/> No liquid was added to or taken out of the tank during the test. [280.43(b)(1)] <input type="checkbox"/> Equipment is capable of 1/8-inch measurement. [280.43(b)(3)]
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	D. Tightness Testing (Safe Suction piping does not require testing) <input type="checkbox"/> Testing method is capable of detecting a 0.1 gal/hr leak rate from any portion of tank routinely containing product. [280.43(c)] <input type="checkbox"/> Tightness testing is conducted within specified time frames for method: <div style="margin-left: 20px;"> <input type="checkbox"/> Tanks - every 5 years [280.41(a)(1)] <input type="checkbox"/> Pressurized Piping - annually [280.41(b)(1)(ii)] <input type="checkbox"/> Non-exempt suction piping - every 3 years [280.41(b)(2)] </div> <input type="checkbox"/> Tightness testing is conducted following manufacturer's instructions. [280.40(a)(3)]
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	E. Ground Water or Vapor Monitoring <input type="checkbox"/> Ground water in the monitoring well is never more than 20 feet from the ground surface. [280.43(f)(2)] <input type="checkbox"/> Vapor monitoring well is not affected by high ground water. [280.43(e)(3)] <input type="checkbox"/> Site assessment has been done for vapor or ground water monitoring. [280.43(e)(6), 280.43(f)(7)] <input type="checkbox"/> Wells are properly designed and positioned. [280.43(e)(6), 280.43(f)(7)]
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	F. Interstitial Monitoring <input type="checkbox"/> Secondary containment can be used to detect a release [280.43(g)(1)], 280.43(g)(2)] <input type="checkbox"/> Sensor properly positioned. [280.40(a)(2)]

Release Detection Compliance Measures Matrix

Worksheet (Continued) - Commonly Used Release Detection Methods			
Tank <small>(Choose one)</small>	Pressurize d Pipe <small>(Choose Two)</small>	Non-exempt Suction Pipe <small>(Choose one)</small>	Release Detection Method
	<input checked="" type="checkbox"/>		G. Automatic Line Leak Detector (ALLD) <input checked="" type="checkbox"/> ALLD is present and operational. [280.44(a)] <input type="checkbox"/> Annual function test of the ALLD has been conducted and records are available. [280.44(a)]
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	H. Other Methods [e.g., Statistical Inventory Reconciliation (S.I.R.)] <input type="checkbox"/> The method can detect a 0.2 gal/hr leak rate or a release of 150 gal within a month and meet the 95/5 requirement [280.43(h)(1)]; or <input type="checkbox"/> The implementing agency has approved the method as being as effective as tank tightness testing, automatic tank gauging, vapor monitoring, ground water monitoring, or interstitial monitoring and the operator complies with any conditions imposed by agency. [280.43(h)(2)] <input type="checkbox"/> S.I.R. - Results are received within time frame established by implementing agency. [280.41(a) & 280.43(h)]

Notes: N/A - Indicates that the measure is not applicable.

Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Detection Compliance Measures.

In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

BP
653 HEMPSTEAD TPK
ELMONT NY 11003

11-13-14 4:38 PM

LEAK TEST REPORT

T 1:REGULAR
PROBE SERIAL NUM 230094

TEST STARTING TIME:
11-10-14 2:00 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 2063.6 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST INVL

0.20 GAL/HR FLAGS:
LOW LEVEL TEST ERROR

* * * * * END * * * * *

BP
653 HEMPSTEAD TPK
ELMONT NY 11003

11-13-14 4:38 PM

LEAK TEST REPORT

T 2: SUPER
PROBE SERIAL NUM 205061

TEST STARTING TIME:
11-10-14 2:00 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 1034.7 GAL

LEAK TEST RESULTS
0.20 GAL/HR TEST INVL

0.20 GAL/HR FLAGS:
LOW LEVEL TEST ERROR

***** END *****

BP
653 HEMPSTEAD TPK
ELMONT NY 11003

11-13-14 4:38 PM

LIQUID STATUS

11-13-14 4:38 PM

NONE

***** END *****